



March 13, 2008

Indiana Economic Development Corporation

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Angela Smith Jones  
Board Director  
Indiana State Board of Registration for Professional Engineers

Dear Ms. Jones:

Pursuant to IC 4-22-2-28, the Indiana Economic Development Corporation ("IEDC") has reviewed the economic impact analysis for small business associated with rule changes proposed by the Indiana State Board of Registration for Professional Engineers ("Board") and contained in LSA Document 07-664, which adds 864 IAC 1.1-15 concerning continuing education requirements for individuals and businesses operating as professional engineers in the State of Indiana.

The types of small businesses most likely to be affected by this proposed rule are engineering firms, professional engineers and continuing education providers. The anticipated numbers of small businesses in each classification are as follows:

- |   |        |
|---|--------|
| • Professional Engineers  | 11,849 |
| • Professional Engineer Professional Corporations                     | 83     |
| • Professional Engineer Continuing Education Sponsoring Organizations | 3      |

The proposed rule will require engineers to obtain thirty (30) hours of continuing education during each two (2) year license period in order to renew their license in active status (which permits the person to practice). Those that renew "inactive" will still be required to pay their licensing renewal fees; however, they will not be able to practice and will not be required to obtain continuing education until they reactivate their license. These continuing education requirements are not in place under the current rules. In 2006 679 engineering licenses were issued in Indiana. There were 705 licenses issued in 2007.


The cost of continuing education credit is \$150 per credit hour. Therefore, the cost to satisfy the 30 hour continuing education requirement for the two year term is \$4,500 per licensee. However, many professional engineers already participate in continuing education programs. The additional cost for these entities will be less since they will have already satisfied all, or a portion, of the continuing education requirements under the proposed rule. Additionally, twenty-nine other states already impose continuing education requirements. Indiana-based engineers practicing in those states will already have satisfied some or all of the continuing education requirements in the proposed rule, leading to a lower cost for these engineers. Administrative or record keeping costs associated with the proposed rule are not anticipated to be substantial.

The IEDC does not object to the economic impact to small businesses associated with the rule changes. Continuing education for professional engineers promotes quality

within the industry, and many engineers are already participating in continuing education programs. While the total cost of obtaining the continuing education credit required for the licensing term could be up to \$4,500 per engineer, the cost will be less in many cases where the engineer has already satisfied a portion of the continuing education requirement.

If you have any questions about the comments contained herein please contact me at 232-8962 or [rasberry@iedc.in.gov](mailto:rasberry@iedc.in.gov).

Regards,

A handwritten signature in black ink, appearing to read "Ryan Asberry", with a stylized flourish at the end.

Ryan Asberry  
Assistant Vice President  
Indiana Economic Development Corporation